

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

**Charles Edward Rodgers, Jr.**

**aka Charles Rodgers,**

Case No. 1-19-40975-ess

Chapter 7

**HON. Elizabeth S. Stong**

Debtor(s).

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**NOTICE OF MOTION**

**PLEASE TAKE NOTICE**, that upon the annexed application of attorneys for SELENE FINANCE LP AS SERVICER FOR MTGLQ INVESTORS, L.P. (hereinafter “Movant”), the undersigned respectfully moves this Court for an order, pursuant to 11 U.S.C. § 362(d)(1) and (d)(2) terminating the automatic stay herein as to the lien interest of Movant in real property of the debtor commonly known as 130-07 227TH STREET, LAURELTON, NY 11413 and such other and further relief as to the Court may seem just and proper.

**PLEASE TAKE FURTHER NOTICE** that this motion shall be returnable on the 5<sup>th</sup> day of November, 2019 at 10:00 a.m. of that day, or as soon thereafter as counsel can be heard, before the Hon. Judge Elizabeth S. Stong at Conrad B. Duberstein Courthouse, 271-C Cadman Plaza East - Suite 1595, Brooklyn, NY 11201-1800.

**PURSUANT TO BANKRUPTCY RULE 9014 AND LOCAL BANKRUPTCY RULE 9006-1(b), IF YOU INTEND TO OPPOSE THE MOTION, YOU MUST SERVE ON MOVANT'S COUNSEL AND FILE WITH THE CLERK OF THE BANKRUPTCY COURT, WRITTEN OPPOSITION TO THE MOTION SO AS TO ENSURE ACTUAL RECEIPT NOT LATER THAN SEVEN (7) DAYS BEFORE THE RETURN DATE.**

Dated: September 26, 2019  
Westbury, NY

By: /s/ Barbara Whipple  
Barbara Whipple, Esq.  
Attorneys for Movant  
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TO:

Charles Edward Rodgers, Jr.  
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Paul I. Krohn  
40 Clinton Street  
Suite 1G  
Brooklyn, NY 11201

Office of the United States Trustee  
Eastern District of NY (Brooklyn Office)  
U.S. Federal Office Building  
201 Varick Street, Suite 1006  
New York, NY 10014

***Chamber's Copy***  
Hon. Elizabeth S. Stong  
U.S. Bankruptcy Court  
Conrad B. Duberstein Courthouse  
271-C Cadman Plaza East, Suite 1595  
Brooklyn, NY 11201